IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS GALVESTON DIVISION

WORLDWIDE PRIORITIES, LTD.,	§	
	§	
Plaintiff,	§	
V.	§	
	§	
PANTAENIUS AMERICAN YACHT	§	
INSURANCE, AGCS MARINE	§	C.A. NO. 3:15-CV-00047
INSURANCE COMPANY, STARR	§	
INDEMNITY & LIABILITY COMPANY,	§	
LIBERTY MUTUAL INSURANCE	§	
COMPANY, and TORUS NATIONAL	§	
INSURANCE COMPANY,	§	
	§	
Defendants.	§	

NOTICE OF SETTLEMENT

TO THE HONORABLE UNITED STATES DISTRICT JUDGE GEORGE HANKS:

COME NOW, the parties in the above-referenced cause, and respectfully announce that they have reached an amicable resolution of this matter. Accordingly, the controversy existing with respect to this action no longer exists, and the issues requiring resolution are now moot, subject only to the parties' exchange of the consideration called for in their agreement and the execution of the documents necessary to consummate the agreement between the Parties.

Counsel for the Plaintiff and the Defendants shall submit an Agreed Motion to Dismiss With Prejudice and a proposed Agreed Order of Dismissal With Prejudice to the Honorable Court immediately upon the consummation of the settlement. Pursuant to the parties' settlement agreement, it is expected that the settlement shall be consummated on or before September 29, 2016.

It is the Parties' understanding and intent that this cause be returned to the Court's active docket if the aforementioned dismissal documents are not filed with the Court on or before October 7, 2016.

WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendants respectfully request that this Honorable Court terminate and cancel all proceedings presently scheduled with respect to the above-referenced cause pending the consummation of the settlement, whereupon an Agreed Motion to Dismiss With Prejudice and proposed Agreed Order of Dismissal With Prejudice shall be presented to the Honorable Court.

Respectfully submitted,

THE BUZBEE LAW FIRM

By: <u>/s/ Christopher J. Leavitt</u>

Anthony G. Buzbee

Texas Bar No. 24001820

Email: <u>TBuzbee@txattorneys.com</u>

Christopher J. Leavitt

Texas Bar No. 24053318

Email: <u>CLeavitt@txattorneys.com</u>

600 Travis, Suite 7300

Houston, Texas 77002

[T] (713) 223-5393

[F] (713) 223-5909

ATTORNEYS FOR PLAINTIFF

MARTIN, DISIERE, JEFFERSON & WISDOM, L.L.P.

By: /s/ P. Wayne Pickering

Christopher W. Martin

E-mail: martin@mdjwlaw.com

Texas Bar No. 13057620

P. Wayne Pickering

E-mail: pickering@mdjwlaw.com

Texas Bar No. 15975030

808 Travis St., 20th Floor

Houston, Texas 77002

[T] (713) 632-1700

[F] (713) 222-0101

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

This is to certify that a copy of this instrument has been forwarded to all counsel listed below on September 12, 2016, through electronic service via the Court's CM/ECF system:

Anthony G. Buzbee

Email: TBuzbee@txattorneys.com

Christopher J. Leavitt

Email: CLeavitt@txattorneys.com

THE BUZBEE LAW FIRM J.P. Morgan Chase Tower 600 Travis, Suite 7300 Houston, Texas 77002

/s/ P. Wayne Pickering
P. Wayne Pickering